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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

DOMINIQUE PRESSEY, as individual Heir and as Special Administratrix of the ESTATE OF ROY ERIC GIORGI JR., MICHAEL GIORGI, as Individual Heir, SOPHIA FRANZ, as Individual Heir, and GABRIELLE GIORGI, as Individual Heir,

**Plaintiff,**

V.

UNITED STATES OF AMERICA,

Defendant.

Case No. 3:24-cv-00463-MMD-CSD

## **Stipulation and Order to Extend Discovery Deadlines**

## (First Request)

Pursuant to LR IA 6-1 and LR 26-3, the parties request a sixty (60) day extension of discovery deadlines, which is supported by grounds and circumstances set forth below. This stipulation is filed at least 21 days before the earliest deadline to be extended (for initial expert disclosures). This is the first request for an extension of the discovery schedule.

## **DISCOVERY COMPLETED**

The parties have completed the following discovery:

1. Defendant made its initial disclosures on January 31, 2025.
2. Plaintiffs made their initial disclosures on January 13, 2025.
3. Defendant served its first sets of requests for production and first sets of interrogatories on Plaintiffs on February 10, 2025.

1       4. Plaintiffs have not served their responses to Defendant's first set of requests for  
2 production or to Defendant's first set of interrogatories.

3       5. Plaintiffs have not yet provided HIPAA authorizations to allow Defendant to  
4 obtain the pertinent medical records. Defendant is waiting for HIPAA authorizations to  
5 obtain the pertinent medical records.

6

## 7                   **DISCOVERY REMAINING**

8       Defendant will need to take the depositions of Plaintiffs Michael Giorgi  
9 Sophia Franz, and Gabrielle Giorgi, whose current location is unknown at this time.  
10 Plaintiff will need to take the depositions of the medical providers involved with this case.  
11 Defendant will need to retain its expert(s). Due to the unavailability of government funding  
12 this process has taken longer than expected. Defendant has subpoenaed both Plaintiffs'  
13 medical records and once received will need to provide them to its expert(s).

14      The parties reserve the right to engage in any other discovery permitted by  
15 applicable rules and within the revised discovery deadlines if the court approves this  
16 stipulation.

17                   **WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED**

18      Since the entry of the Scheduling Order (ECF No. 15), the parties have been  
19 working diligently to advance discovery.

20      The extension will allow the parties to schedule and conduct the depositions of  
21 Plaintiffs, whose location is currently unknown, as well as non-party witnesses. The  
22 additional time will permit Defendant to retain experts and to provide them records to  
23 review in preparation of their expert opinions. Additionally, this extension will allow the  
24 parties to address discovery issues and schedule and complete any remaining depositions.

25      The parties' counsel conferred and agreed that a sixty (60) day extension would be  
26 proper. The parties agree that neither party will be prejudiced by the proposed extension,  
27 and that they may be prejudiced should the current schedule remain in place. The parties  
28 agree the extension is sought in good faith.

**EXTENSION OF THE DISCOVERY PLAN AND SCHEDULING ORDER**

The following table sets forth the current deadlines and the proposed sixty (60) day extension of discovery deadlines that are the subject of this stipulated request:

<b>SCHEDULED EVENT</b>	<b>CURRENT DEADLINE</b>	<b>PROPOSED DEADLINE</b>
Initial Expert Disclosure	April 10, 2025	<b>June 9, 2025</b>
Rebuttal Expert Disclosure	May 12, 2025	<b>July 11, 2025</b>
Discovery Cutoff	June 9, 2025	<b>August 8, 2025</b>
Dispositive Motions	July 9, 2025	<b>September 8, 2025</b>
Proposed Joint Pretrial Order	August 8, 2025	<b>October 7, 2025</b>

This request for an extension of time is not sought for any improper purpose including delay. This is the first request for an extension of discovery deadlines in this matter.

Respectfully submitted this 18th day of February 2025.

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IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

DATED: February 18, 2025